

12973 Endicott Drive NW
Clearwater, MN 55320
February 15, 2005

Ms. Francine Torres, Administrator
USDA-AMS-TMP-NOP
1400 Independence Avenue, SW., Room 4008-So, AG Stop 0268
Washington, D.C. 20250-0200

Re: Pasture Requirements are Vital to Organic Standards!

Dear Ms. Torres,

As you will recognize, my letter contains information supplied by an organization that I highly respect—they are the group I buy my organic food from. Although you will see items that are from a “canned” letter, please do not disregard the strong intent of my letter. **I would like to express my strong support for the recommendations from the National Organic Standards Board Livestock Committee from February 1, 2005 regarding pasture requirements for the National Organic Program.**

As a consumer, I need to know that the USDA organic seal represents the true meaning of “organic” which includes pasturing of animals as outlined in the new recommendation.

Animals are an important part of our human survival—But that doesn’t mean that we can treat them however is most profitable. I firmly believe requiring pasture for ruminants ensures an organic production system which provides living conditions that allow animals to satisfy their natural behavior patterns, provides preventative health care benefits and answers my expectation of humane animal care and ideal welfare.

Providing cows access to pasture assures that organic principles are being met, with an interrelated system between the animals and the land, working from the soil up to promote an interdependent community. Pasture provides benefits to cows that include improved foot and leg strength, reduced breeding problems, less stress, lower culling rates, and enhanced immunity.

Animals utilizing pasture naturally avoid the concentration of manure issues associated with dry lot production. Allowing the cows to go to their food rather than bringing feed to the cows means less use of machinery and non-renewable resources.

Active management of quality pasture is an excellent way to improve soil quality. Careful rotation of pasture ensures maximum utilization of the capture of solar energy, the basis for growing all food. Allowing some pasture areas to be fallow for a portion of the season benefits biodiversity by providing habitat for grassland birds.

A recent study conducted by the Danish Institute of Agricultural Research tested milk from cows farmed organically and found that it was 50% higher in Vitamin E, 75% higher in beta carotene and higher in omega 3 essential fatty acids than conventional milk. This study tied these qualities to organic cows having more room to graze and a diet high in forage, fresh grass and clover.

For these reasons, **I would like to support the Livestock Committee’s recommendation that grazed feed must provide a significant portion of the total feed requirements. I firmly believe that lactation of dairy animals is not a stage of production under which animals may be denied pasture for grazing. I would like to see these recommendations be incorporated into the standards as mandated production practices.**

Thank you for your consideration of this very important issue.

Sincerely,


Margaret Campbell Charlebois